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Attorneys for Defendant Joaquin O. Atalig

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

DONGBU INSURANCE COMPANY, LTD.,)	CIVIL ACTION NO. CV 08-0002
)	
Plaintiff,)	
)	
vs.)	PRE-DISCOVERY DISCLOSURE
)	STATEMENT OF DEFENDANT
OKP (CNMI) CORPORATION AND)	JOAQUIN Q. ATALIG AND REQUEST
JOAQUIN Q. ATALIG,)	FOR RECIPROCAL INITIAL
)	DISCLOSURES
Defendants.)	

Defendant Joaquin Q. Atalig, by and through counsel, hereby submits his Pre-Discovery Disclosure Statement, pursuant to LR 16.2CJd and FED.R.Civ.P. 26(a), and hereby requests reciprocal initial disclosures. Mr. Atalig's initial disclosures are as follows:

A. The name, and if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its

claims or defenses, unless solely for impeachment, identifying the subjects of the information.

1. Joaquin Q. Atalig—Songsong, Rota, MP 96951, telephone no. 532-0478, re damages to his properties in Ginalangan, Rota.

B. A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

1. Dongbu Automobile Policy and Contractor's All Risk Policy.

C. A computation of any category of damages claimed by the disclosing party.

1. A computation of damages will be provided to the parties as soon as practicable.

D. Any insurance agreement(s) under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

1. Mr. Atalig anticipates that Dongbu and/or OKP will provide a complete copy of all applicable policies.

Dated: April 24, 2008

Respectfully submitted,

O'CONNOR BERMAN DOTTS & BANES

/s/

Michael W. Dotts, Esq. (F0150)
Attorneys for Defendant Atalig

Dated: April 24, 2008

LAW OFFICES OF RAMON K. QUICHOCHO, LLC

/s/

Ramon K. Quichocho, Esq. (F0243)
Attorney for Defendant Atalig